

1 THE HONORABLE JAMAL N. WHITEHEAD
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 PLAINTIFF PACITO; PLAINTIFF ESTHER;
11 PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
12 PLAINTIFF ALYAS; PLAINTIFF MARCOS;
13 PLAINTIFF AHMED; PLAINTIFF RACHEL;
14 PLAINTIFF ALI; HIAS, INC.; CHURCH
15 WORLD SERVICE, INC.; and LUTHERAN
16 COMMUNITY SERVICES NORTHWEST,

17 *Plaintiffs,*

18 v.
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20 DONALD J. TRUMP, in his official capacity as
21 President of the United States; MARCO RUBIO,
22 in his official capacity as Secretary of State;
23 KRISTI NOEM, in her official capacity as
24 Secretary of Homeland Security; ROBERT F.
25 KENNEDY, JR., in his official capacity as
Secretary of Health and Human Services,

26 *Defendants.*

Case No. 2:25-cv-255-JNW

**DECLARATION OF DEEPA
ALAGESAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

26 Deepa Alagesan, declares, pursuant to 28 U.S.C. § 1746, as follows:

27 1. I am a Senior Supervising Attorney at the International Refugee Assistance
28 Project (“IRAP”) and am counsel for Plaintiffs in the above-captioned case. I respectfully submit
29 this declaration in support of Plaintiffs’ Motion for Class Certification.

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1 2. I graduated from Harvard Law School in 2012 and have been licensed to practice
 2 in New York and Massachusetts since 2013.

3 3. I am admitted to practice in the U.S. District Courts for the Eastern, Southern, and
 4 Western Districts of New York, the District of Columbia, the District of Massachusetts, the
 5 District of Maryland, and the Western District of Washington, and the U.S. Courts of Appeals
 6 for the Second, Ninth, and D.C. Circuits.

7 4. In October 2017, I began working at IRAP as an attorney in the U.S. litigation
 8 department. Between my admission to the bar and starting at IRAP, I worked as an associate at
 9 Cleary, Gottlieb, Steen & Hamilton LLP and as a law clerk for the U.S. District Court for the
 10 Eastern District of New York and the U.S. Court of Appeals for the Second Circuit.

11 5. IRAP was founded in 2008 and is the first organization to provide comprehensive
 12 legal representation to refugees throughout the registration, protection, and resettlement process,
 13 working in some of the world's regions most traumatized by war, hostility, and political
 14 upheaval. Since its establishment, IRAP has provided legal assistance to tens of thousands of
 15 refugees. IRAP mobilizes litigation, direct legal aid, and systemic advocacy to assist refugees
 16 and other persecuted individuals.

17 6. IRAP's litigation department brings systemic litigation to challenge refugee and
 18 immigrants' rights violations and government policies that impact refugees and others in
 19 humanitarian need. In addition to me, the litigation department currently has a litigation director,
 20 two supervising attorneys, two staff attorneys, three fellows and a paralegal.

21 7. Since its inception, IRAP's litigation department has been involved in many
 22 complex cases on behalf of refugees and others in humanitarian need. Some of IRAP's lawsuits
 23 include: challenges to the prior Trump Administration's travel ban and refugee ban, *see IRAP v.*
24 Trump, No. TDC-17-0361 (D. Md. 2017) (as plaintiff); *Doe v. Trump*, No. C17-0178JLR (W.D.
 25 Wash. 2017) (as counsel); challenge to the prior Trump Administration's executive order
 26 allowing states and localities to veto refugee resettlement, *see HIAS, Inc. v. Trump*, No. 19-cv-

1 3346-PJM (D. Md. 2019); challenge to the prior Trump Administration's termination of the
 2 Central American Minors (CAM) parole program, *see S.A. v. Trump*, No. 18-cv-03539-LB (N.D.
 3 Cal. 2018).

4 8. I have litigated several complex class action lawsuits during my tenure at IRAP.
 5 In each of these lawsuits, IRAP was designated as co-class counsel. I served as class counsel in
 6 *Abdi v. Nielsen*, a class-action challenge to the detention of arriving asylum-seekers in a federal
 7 immigration facility in upstate New York. *See Abdi v. Duke*, 323 F.R.D. 131 (W.D.N.Y. 2017). I
 8 also served as class counsel in *Jane Doe I v. Nielsen*, a class-action challenge to the mass denial
 9 of refugee applications for refugees applying for entry through a special program for persecuted
 10 religious minorities. *See Jane Doe I v. Nielsen*, 357 F. Supp. 3d 972 (N.D. Cal. 2018). I continue
 11 to litigate and serve as class counsel in *Afghan and Iraqi Allies v. Rubio*, a complex, long-
 12 standing class action challenging the U.S. government's delays in the processing of Special
 13 Immigrant Visa applications of Afghan and Iraqi nationals whose lives are at risk because of
 14 their work supporting the United States. *See Afghan and Iraqi Allies v. Rubio*, No. 18-cv-1388
 15 (D.D.C.).

16 9. IRAP attorneys and paralegals have spent countless hours preparing this litigation
 17 and prosecuting this matter to date. Since filing this lawsuit, in the space of a month IRAP has
 18 filed two motions for preliminary injunctive relief and a motion for an emergency hearing, in
 19 addition to representing Plaintiffs at two court hearings. In addition to me, the other attorneys of
 20 record at IRAP and other staff members have spent significant hours on this case including
 21 conducting legal research, drafting briefs and declarations, preparing and conducting oral
 22 argument, communicating with plaintiffs, and investigating constantly changing factual matters
 23 in this case. IRAP is committed to continuing to devote significant resources to vigorously
 24 litigate this case on behalf of the entire Class.

25 10. IRAP has also spent many hours conducting outreach to plaintiffs and putative
 26 class members, who are located all over the world and across the United States. In addition,

1 IRAP's direct legal services department has been involved with reviewing intakes and
2 communicating with and assisting putative class members who are affected by the government
3 actions that are at issue in this lawsuit and reached out to IRAP for assistance. This work, which
4 is at the core of IRAP's direct services work, almost invariably requires working closely with
5 interpreters, as many putative class members do not speak English. As described above, IRAP
6 has been certified as class counsel on behalf of class members facing similar obstacles to the
7 proposed class here and has the necessary experience and commitment to effectively represent
8 the proposed class.

9
10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed at New York, New York on March 14, 2025

12 s/ Deepa Alagesan
13 Deepa Alagesan, *admitted pro hac vice*